U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

EXHIBITS TO SUPPORT

PLAINTIFF SWEIGERT'S APPLICATION FOR A SHOW CAUSE EVIDENTIARY HEARING IN SUPPORT OF RULE 56(h)

MAY IT PLEASE THE COURT, these are **EXHIBITS** to support **APPLICATION FOR A**

SHOW CAUSE EVIDENTIARY HEARING is responsive to ECF 279/280.

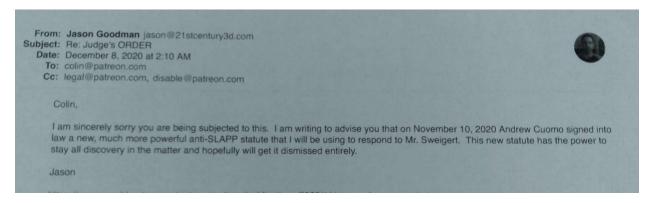
The undersigned hereby attests under penalties of perjury that this pleading is not submitted for the purposes of causing unnecessary delay and is believed to be accurate to the best of the Plaintiff's knowledge and that the attached exhibits are true and accurate reproductions of the original source documents on this eleventh day of July (7/11), two thousand and twenty-one (2021). A certificate of service is provided on the last page.

D. GEORGE SWEIGERT Pro Se Non-Attorney GENERAL DELIVERY NEVADA CITY, CA 95959

D. 500

EXHIBITS START

SHOW CAUSE (SC-1) ONE



Defendant did not supply electronic copy of this exhibit.

From: Jason Goodman jason@21stcentury3d.com
Subject: Re: Judge's ORDER
Date: December 8, 2020 at 2:10 AM
To: colin@patreon.com
Cc: legal@patreon.com, disable@patreon.com

being subjected to this. I am writing to advise you that on November 10, erful anti-SLAPP statute that I will be using to respond to Mr. Sweigert. The ter and hopefully will get it dismissed entirely.

https://www.arnoldporter.com/en/perspectives/publications/2020/11/new-yorksnew-anti-slapp-law

law a new, much more powerful anti-SLAPP statute that I will be using to respond to Mr. Sweigert. This new statute has stay all discovery in the matter and hopefully will get it dismissed entirely. Jason https://www.arnoldporter.com/en/perspectives/publications/2020/11/new-yorks-new-anti-slapplaw#:~:text=New%20York's%20new%20anti%2DSLAPP.the%20constitutional%20right%20of%20free On Dec 7, 2020, at 7:34 PM, Spoliation Notice < spoliation-notice@mailbox.org> wrote:

Arnold&Porter

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Careers

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Media Mentions

New York's New and Improved Anti-SLAPP Law Effective Immediately

By Theresa M. House, Kyle A. Schneider

On Dec 7, 2020, at 7:34 PM. Spoliation Notice < spoliation-notice@mailbox.org> wrote:

To: Patreon Legal Department

Attached is the discovery ORDER of the magistrate judge in the lawsuit involving your subscriber:

JASON GOODMAN CROWDSOURCE THE TRUTH



November 17, 2020

New York's New and Improved Anti-SLAPP Law Effective Immediately

Advisory

By Theresa M. House Kyle A. Schneider

On November 10, 2020, Governor Andrew Cuomo signed into law an update to New York's anti-SLAPP law that dramatically expands protections afforded to defendants in lawsuits brought based on the exercise of free speech rights, and which significantly increases the risks to potential plaintiffs bringing defamation and other speech-based claims in New York.

What Is an Anti-SLAPP Law?

The term "SLAPP" is an acronym for "Strategic Lawsuit Against Public Participation," and the goal of an anti-SLAPP law is to deter these types of lawsuits—lawsuits that are filed not to vindicate a fair and reasonable legal claim, but to punish or harass a defendant for participating in public life. Defendants facing so-called "SLAPP suits" can include not only journalists and traditional media/entertainment organizations, but also individuals and companies in other industries that speak on issues of interest to the public—on social media, in marketing, or any other form of participation in the marketplace of ideas. The "strategy" of a SLAPP suit is to saddle the defendant with such

burdensome litigation costs that it chills, ceases, or retracts its speech. Anti-SLAPP laws seek to deter SLAPP suits by expanding the legal protections available to defendants targeted by such suits, and by imposing costs on the plaintiffs that bring them.

What Has New York Done?

Although New York already had an anti-SLAPP law on the books, adopted nearly 30 years ago, the old version of the law applied only narrowly to lawsuits brought by plaintiffs who had sought public permits, zoning changes, or other similar entitlements from a government body, against defendants who had reported on, ruled on, or challenged the plaintiff's petition to the government body. It generally did not apply to speech by journalists in traditional media outlets or speech by anyone on social media concerning the issues of the day.

New York's new anti-SLAPP law will now extend, far more broadly, to lawsuits based upon "any communication in a public place open to the public or a public forum in connection with an issue of public interest" or based upon "any other lawful conduct in furtherance of the exercise of the constitutional right of free speech in connection with an issue of public interest " Because the statute also states that "public interest" should be "construed broadly, and shall mean any subject other than a purely private matter," the new anti-SLAPP law should be expected to sweep up political and social discussions, as well as entertainment productions.

What Protections Does New York's New Anti-SLAPP Law Contain?

In total, 30 states and the District of Columbia possess some form of anti-SLAPP legislation, but not all anti-SLAPP laws are created equal. With the amendments to New York's Civil Rights Law §§ 70-a, 76-a signed into law by Governor Cuomo, New York joins about 18 other states that have adopted robust anti-SLAPP protections that apply to speech about public issues. A speech-protective anti-SLAPP regime will allow a targeted defendant to escape a bad-faith SLAPP suit quickly and without incurring high legal costs or invasive discovery. As amended, New York's anti-SLAPP law does exactly this.

From: Spoliation Notice < spoliation-notice@mailbox.org>

To: Jason Goodman <truth@crowdsourcethetruth.org>, Spoliation Notice <spoliation-notice@mailbox.org>, "colin@patreon.com" <colin@patreon.com>, "legal@patreon.com" <legal@patreon.com>, "disable@patreon.com" <disable@patreon.com>, "georg.webb@gmail.com" <georg.webb@gmail.com>, "jason@21stcentury3d.com" <jason@21stcentury3d.com>, "jasongoodman72@protonmail.com" <jasongoodman72@protonmail.com>

Date: 12/08/2020 1:34 AM

Subject: Judge's ORDER

To: Patreon Legal Department

Attached is the discovery ORDER of the magistrate judge in the lawsuit involving your subscriber:

JASON GOODMAN
CROWDSOURCE THE TRUTH

Please see para. 2 (a) of the attached. It may be advisable to seek outside legal counsel.

It may also be advisable for Patreon to reconsider its relationship with the following subscribers:

GEORGE WEBB
JASON GOODMAN

Regards,

D. G. Sweigert

> On 11/29/2017 7:27 PM Jason Goodman <truth@crowdsourcethetruth.org> wrote:</truth@crowdsourcethetruth.org>
>
>
>
> Hi Dave,
>
>
> Thanks for all this evidence you are generating with regard to your ongoing per se libel. It's awesome that I now know how to push your buttons. Mental illness is a terrible thing. You really should be confined for your own safety and that of others. I'm sure the court will enjoy the videos in which you make death threats against me.
>
> On Nov 29, 2017, at 1:16 PM, Spoliation Notice <spoliation-notice@mailbox.org> wrote:</spoliation-notice@mailbox.org>
>
>
>> To:
>> Colin Sullivan
>> Bar no. 285203
>> General Counsel
>> Patreon, Inc.
>>
>> Dear Sir,
>>
>> This notice requests that you begin the process of a litigation hold on all electronic evidence stored, processed or transmitted by your organization for the following account:
>>
>> crowdsourcethetruth
>>
>> The operator of this account is a defendant in a federal lawsuit:

>>
>> Jason Goodman
>>
>> This request is an evidence preservation request to prevent spoliation of electronic evidence that will be sought in federal litigation (please consult Federal Rules of Civil Procedure for guidance).
>>
>> Mr. Goodman is a defendant to allegations that concern public doxing, copyright violations, harassment and hate speech. All which appear to violate the community standards policy of Patreon.
>>
>> Recently, Mr. Goodman has allegedly published a series of videos on your platform that attack the privacy, physical characteristics, and intelligence of private citizens in the State of California that Mr. Goodman perceives may be friends of the plaintiff in this federal lawsuit.
>>
>> Therefore, as your company holds this evidence, and as it will be required to be admitted into the court record, a strong request is hereby made that you preserve this evidence (account application, invoices, payments, video content, records of messages, transactions with Mr. Goodman, etc.).
>>
>> As many of these actions allegedly violate California privacy laws, there is an increased duty to preserve these records as follow-up complaints shall be lodged with the California Attorney General with a copy of this notification.
>>
>> If your organization allows this behavior to persist, serious consideration will be given to adding Patreon as a co-defendant in this federal litigation as your company will only be aiding in the distribution of the offense material.
>>
>> This is a very serious matter as law enforcement has become involved.
>>
>> Thank you.
>>
>> Evidence Collection Team

Case 3:17-cv-00601-MHL Document 60 Filed 06/13/18 Page 22 of 35 PageID# 752

To quote Mr. Goodman from the YouTube video "Sunday with Charles - (Special Wednesday Hammer Drop Edition) Bonnie and Clyde, 12/6/2017 (21K+ views):

1

2

3

4

5

2:32:00 GOODMAN. And you know, as I have said, we have gotten over the past several months a lot of news from Mr. Hudson and the various members of the Hudson Group – that I am in touch with. While he is not broadcasting with us. And, uh. [emphasis added]

Heing such fraudulant video content to colicit funds from the nublic is an honest services fraud 1811 S.

12 COUNT THREE: FRAUDULENT "HUDSON INTELLIGENCE GROUP" 13 In a YouTube video, entitled "Hudson Revealed", 8/14/2017, (on the Jason Goodman channel), (20K+ 14 views) the following description is provided: 15 Published on Aug 14, 2017 With over 40 years of military, intelligence and clandestine experience, confidential Crowdsource operative codename: HUDSON steps forward after months in the shadows. 16 While operating in the background, Mr. Hudson has provided guidance and information assisting George 17 and Jason daily for the past several months. 18 Pressure mounts as the real possibility of a coup d'etat in America grows each day. 19 20 CONTINUED INTEREST IN THE PORT TO SUPPORT MONEY COLLECTIONS 21 During the interview between Goodman and Rock Hudson (Marshal Richards), Hudson proclaims: 22 39:18. HUDSON. [Source of dirty bomb hoax tip] In regards to George Webb, I have a tremendous 23 respect for Webb. 24 39:33. HUDSON. George is just an amazing ... what a mind. 25 39:39: GOODMAN. Yeah. 26 27 28 COMPLAINT PURSUANT TO FEDERAL RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT - 17

Case 3:17-cv-00601-MHL Document 60 Filed 06/13/18 Page 21 of 35 PageID# 751

40:20: HUDSON. We have documents from the United Nations - UNODC. [United Nations Office on
Drugs and Crime] And so here is what we know - not, not from us. But, from what we have been able to find out
using their own documentation. I am sure that they are not going to like the idea that we have them. [Laughter]
40:40: HUDSON. They need to keep things more secure. Is all I can say. [Goodman laughs]
40:47: HUDSON. We know for a fact that 425 million cargo containers are transported each year - in
the world [Goodman - uh huh] that represents over 90% of the world's total trade. [Goodman - Amazing]
41:18: HUDSON. Charleston, South Carolina is a port hub. [Goodman - right]. These hubs, depending
on the security protocols that they are using that, that day for that ship. They can process 1,500 to 50,000 contained
per day.
41:48: HUDSON. Based on the United Nations own meta-data in order for a port hub to process 50,000
containers in a 24 hour period is 2,083 containers per hour. [Goodman - seems like a lot]. [Laughter] Well, let's
break it down further - 35 containers per minute. [Goodman - wow].
42:33: HUDSON. Because they are making such an effort to determine if a container is safe or not safe.
They ought to be ashamed of themselves.



Hudson Exposed Ray Looker's Firsthand Account of the Sinister Deception of Okey Marshall Richards

Jason Goodman • 7.1K views • 1 year ago

About 1 year ago, George Webb Sweigert introduced me to an individual allegedly named "Richard Stone". According to the two, Stone was a Vietnam veteran with experience as a "contractor to U.S. in...



Catching up with Mr. Hudson Late Night Call From D.C.

Jason Goodman • 10K views • z vears aug

After a long day, Mr. Hudson shares a variety of insights. Bruce the Patriot death threat tweet (according to NPC) - https://twitter.com/BruceThePatriot/status/903291470521581568 Become a sponsor...



Mr. Hudson Responds to "Smear" Comments

son Goodman • 8K views • 2 years ago

Mr. Hudson's North Korea report was met with numerous negative comments. Was this an organic response or was it a deliberate smear? Grass roots or astro turf? Become a sponsor of Crowdsource



The King and I, and Mr. Hudson

Jason Goodman • 10K views • 2 years ago

A candid conversation with King James and Mr. Hudson about the state of U.S. - North Korean relations.



The Hudson Peport August 23, 2017

Jason Goodman • 6.8K views • 2 years ago

Mr. Hudson and I discuss unfortunate Twitter fallout, EM warfare against the U.S. Navy, Chinagate, spies selling State Secrets, FBI whistleblower Michael McMahon, the often discussed and little und...



The Hudson Report Pirty Bomb Breaking News

Jason Goournan • 7K views • 2 years ago

Reuters and Florida Maquis report on an Indonesia terror plot to use a dirty bomb and potential connections to recent U.S. Navy incidents. Become a sponsor of Crowdsource the Truth and support



Hudson Returns

Jason Goodman • 12K views • 2 years ago

Mr. Hudson returns to answer his critics (and mine) as well as providing his insights into ongoing international and domestic matters including #Qanon. Videos Mr. Hudson recommends re: Naval



Hudson Report PHX

an • o. rK views • 2 years ago

Updates from Mr. Hudson as I make my way to Phoenix, AZ to attend the Trump rally where POTUS is widely expected to pardon controversial Sheriff Joe Arpaio, or will he? Upon arriving in Phoenix, M...



Hudson Report Is Imran Awan's Lawyer Lying?

Jason Goodman • 10K views • 2 years ago

Mr. Hudson weighs in on a threatening lawyer letter sent to Andre Taggart, the possibility that Christopher Gowen has lied in court, the incredibly stupid nature of Robert David Steele's fake lawsu...



The Hudson Report Lugust 26, 2017 U.S. Diplomats Under Attack in Cuba

Jason Goodman • 5.1K views • 2 years ago

U.S. Diplomats in Cuba are reporting unusual symptoms as official explanation claim they are the victims of "sonic" weapons attacks. Mr. Hudson offers intelligence that provides an alternate exp..



Hudson Report Awan Bros IT Scandal Hearing

Jason Goognan • 10K views • 2 years ago

Mr. Hudson returns after being off grid for several days on a recon mission. He weighs in on the Las Vegas massacer, Tom Fitton's Awan hearing and other topics. Become a sponsor of Crowdsource th...



ne Hudson Report, USS John McCain Directed Energy Weapon

Jason Goodman • 35K views • 2 years ago

The Hudson Intelligence Group does not believe it to be within the realm of coincidence that two US Naval vessels could be rammed by merchant marine ships. Is a new form of sophisticated electroni...



The Hudson Report BREAKING NEWS - Awans Selling State Secrets

Jason Goodman • 9.7K views • 2 years ago

I've just received a call from Mr. Hudson with astonishing breaking news. This is historic. Become a sponsor of Crowdsource the Truth and support the effort http://paypal.me/crowdsourcethetruth ...



Hudson Report Benjamin Paddock & Battlefield Las Vegas

Jason Goodman • 24K views • 2 years ago

Become a sponsor of Crowdsource the Truth and support the effort http://paypal.me/crowdsourcethetruth https://www.patreon.com/crowdsourcethetruth Public Bitcoin



Checking in with Hudson on the Way to D.C.

Jason Goodman • 6.4K views • 2 years ago

With possibly significant new developments in the Seth Rich murder case revealed last night by George Webb, I felt it important to check in with Mr. Hudson on my way to Washington. Mr. Hudson expr...



Hudson Report August 25, 2017

Jason Goodfiall • 0.5K views • 2 years ago

Mr. Hudson reports on disappearing cargo ships, the Awan brothers spy ring, possible treason in congress and what the Crowdsource community can do about it now.



Hudson Report August 24, 2017

6.1K views • 2 years ago

Mr. Hudson and I discuss the fallout of yesterday's conversation and what lies ahead in the days to come. It's been a rough road but we press on, Michael McMahon FBI whistle blower interview - ht...



The Hudson Report

Hudson Report Awan Bros IT Scandal Hearing • 33:28

Hudson Report - Naming Names: John McCain • 38:36

VIEW FULL PLAYLIST (14 VIDEOS)



The Hudson Report Message to Congress or Clear and Present

Jason Goodman • 8.8K views • 2 years ago

Last minute advice from Mr. Hudson on my way to Washington D.C. to deliver the report on the Awan Brothers spy ring. Become a sponsor of Crowdsource the Truth and support the effort http://paypal...



Hudson Report has Vegas Shooting

14K views • 2 vears ago

Mr. Hudson goes into detail about the ongoing investigation into the Mandalay Bay shooting. Become a sponsor of Crowdsource the Truth and support the effort http://paypal.me/crowdsourcethetruth...



Hudson Revealed

Jason Goodman • 20K views • 2 years ago

With over 40 years of military, intelligence and clandestine experience, confidential Crowdsource operative codename: HUDSON steps forward after months in the shadows. While operating in the bac...



The Hudson Report

Jason Goodman - TTK views • 2 years ago

 $Mr. \ Hudson \ returns \ with \ more \ information \ and \ insight. \ Refer to \ today's \ Hudson \ Report \ PDF \ document. \\ https://drive.google.com/file/d/0B6-xZMRm0ehvUXY2WFZmbzZTWXc/view?usp=sharing \ Become \ a$



Hudson Report Naming Names: John McCain

Jason Goodman • 15K views • 2 years ago

The names are known, they've been listed already. The extent of the deeds may not be as well known to many. Hudson begins to name names as only he can. Become a sponsor of Crowdsource the Truth ...

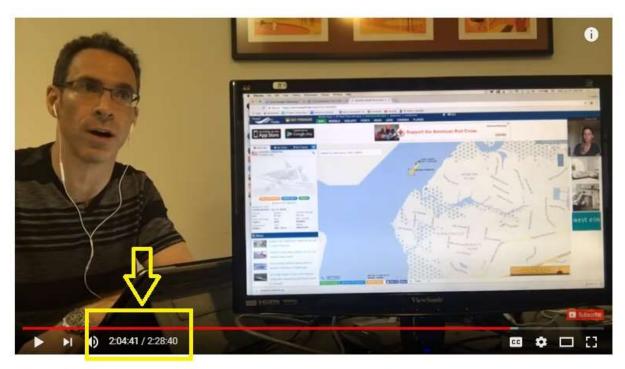


The Hudson Report Multiple Shooters in Las Vegas?

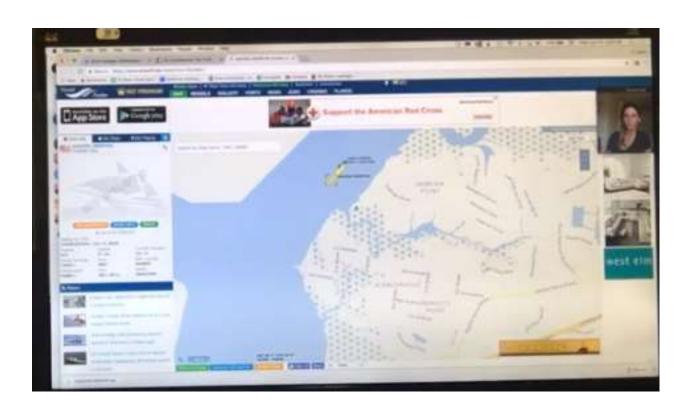
Jason ocedinan 17K Views • 2 years ago

Mr. Hudson provides his analysis that indicates multiple shooters, multiple rates of fire and multiple caliber weapons. Become a sponsor of Crowdsource the Truth and support the effort http://pay...





Clear and Present Danger (Calm Before the Storm?) #maerskmemphis





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D. GEORGE SWEIGERT GENERAL DELIVERY NEVADA CITY. CA 93939

April 14, 2021

Magistrate Judge Stewart D. Aaron U.S. District Court 500 Pearl Street New York, New York 10007-1312

SUBJ: Guidance issues requested for ECF no. 239, 1:18-cv-08653-VEC-SDA

Your Honor.

- Yesterday the Defendant informed his social media podeast viewers that Google, LLC (YouTube.Com) had deleted the "Jason Goodman" YouTube channel with its so-called 119,000 (119K) subscribers. The account termination was based on violations of "Community Standards", according to the Defendant. 2,333 videos, dozens that contained evidence of Defendant's defanuation per se, are no longer available to be viewed.
- The Defendant has stated that the account may be restored and insimuated by implication that the undersigned was responsible for the account take-down. This account termination and possible account restoral will directly impact the discovery abilities of the Plaintiff.
- Concurrently with the alleged account termination, the Defendant docketed ECF no. 239
 (which can be described with the procedural shorthand of an "Anti-SLAPP" motion) under the
 new provisions of the New York State Civil Rights Law Section 76(a). The S.D.N.Y. has seen
 several recent opinions in the applicability of Sec. 76(a) to federal courts. Palw v. N.Y. Times Co.,
 17-cv-4853.
- 4. Sec. 76(a) purports to create an "automatic stay" to all discovery activities, save for those materials needed to support a response to a Sec. 76(a) Anti-SLAPP motion (as ECF no. 239). Thus, if the Court determines that Sec. 76(a) applies to this instant lawsuit, then discovery has halted. In such a scenario the undersigned would request that the discovery period be tolled until such time as it resumes. The Plaintiff is entitled to three (3) weeks of remaining discovery, which existed prior to the filing of ECF no. 239, these three (3) weeks should be set-aside.

Case 1:18-cv-08653-VEC-SDA Document 245 Filed 04/14/21 Page 2 of 3

- 5. Meanwhile, a similar Anti-SLAPP motion awaits determination in related S.D.N.Y. litigation to which the Defendant is a party, National Academy of Television Aris and Sciences, Inc., et. al. v. Multimedia System Design, Inc. d/b/a/ Cronstsource the Truth. No determination has been made in that lawsuit with regards to the applicability of Sec. 76(a) to federal litigation. The undersigned requests that this Court withhold action in this lawsuit pending such a Sec. 76(a) determination, in the interests of judicial efficiency. To complicate matters, if Sec. 76(a) applies this raises the bar concerning the Plaintiff's burden to demonstrate defamation per se allegations to the presumed "actual malice" standard.
- 6. As the recent Requests for Judicial Notice and declarations of Mr. Thomas Schoenberger have illustrated, the Defendant entered a very close cooperative association with Mr. Manuel Chavez, III of Carson City, Nevada. The record demonstrates that Mr. Chavez and the Defendant commenced exchanging over 100 e-mail messages in July 2019 while in voice communications. The net result of these e-mail message exchanges implies that the Defendant behavior meets the "actual malice" standard.
- 7. The Plaintiff alleges that these e-mail messages tend to demonstrate that the Defendant proceeded with reckless disregard to the truth about the Plaintiff's non-participation in a conspiratorial affidiation with Mr. Chavez, Mr. Schoenberger or their presumed associates (the bulk of third-party defendants). The evidence tends to indicate that the Defendant continued to promote the narrative that the Plaintiff was working these people in a "decentralized distributed defamation campaign" to which Mr. Chavez was purportedly the "technical brains".
- 8. For over two years, it is now alleged, the Defendant knew the Plaintiff had no association with the people involved with Mr. Chavez or Mr. Schoenberger (and many others) and yet the Defendant continued to state publicly that he had evidence of felony crimes involving the Plaintiff's participation in such a conspiracy related to these third-party defendants.
- 9. Therefore, Mr. Chavez is an instrumental figure in this lawsuit and needs to be deposed by the Plaintiff. As the Defendant is presently in Las Vegas, Nevada, the Defendant could easily drive to Carson City, Nevada to attend such a deposition. It is believed that such a deposition is needed to demonstrate the "actual mulice" of the Defendant in continuing to promote the idea that the Plaintiff "worked with" Mr. Chavez and/or Mr. Schoenberger.

Case 1:18-cv-08653-VEC-SDA Document 245 Filed 04/14/21 Page 3 of 3

10. In view of the foregoing, the Court should consider the issuance of a subpoena to compel the deposition of Mr. Chavez in Carson City, Nevada or in Las Vegas, Nevada. As you know, Sec. 76(a) allows for evidence to be collected to support the "actual mulice" threshold when responding to an Anti-SLAPP motion.

11. In summary, the Plaintiff requests guidance from the Court on the applicability of Sec. 76(a) to this lawsuit, the impact of ECF no. 239 on discovery timetables (assumed to be frozen presently), and the issuance of a subpoena for Mr. Chavez.

Respectfully.

D. George Sweigert

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the fourteenth day (14th) of April, two thousand and twenty-one (2021).

Clerk of the Court, Room 200 temporary pro se filing@nysd.uscourts.gov Jason Goodman, CEO truthocerowdsourcethetruth.org

D. GEORGE SWEIGERT

Pro Se Non-Attorney
GENERAL DELIVERY
NEVADA CITY, CA 95959

EXHIBITS END

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been transmitted via electronic mail message to the following parties on the eleventh day of July 2021 (07/11/2021).

Clerk of the Court, Room 200	Jason Goodman, CEO
temporary_pro_se_filing@nysd.uscourts.gov	truth@crowdsourcethetruth.org

D. 50

D. GEORGE SWEIGERT Pro Se Non-Attorney GENERAL DELIVERY NEVADA CITY, CA 95959